

## REMARKS

Claims 9-19 and 21-40 are now pending. No claims stand allowed.

Claims 1-8 and 20 had been cancelled without prejudice.

Claims 9-19 and 21-29 have been amended to further particularly point out and distinctly claim subject matter regarded as the invention. The amendment also contains minor changes of a clerical nature. New claims 30-40 have been added by this amendment and also particularly point out and distinctly claim subject matter regarded as the invention. No "new matter" has been added by the amendment.

The specification have been amended to correct certain informalities noted in the Office Action and otherwise. These corrections are of a clerical nature and do not add "new matter".

### Objection to Drawings

The drawings stand objected to as allegedly failing to comply with 37 CFR 1.84(p)(4) because reference characters "26" and "32" have both been used to designate the character generator; reference characters "16" and "42" have both been used to designate the video controller; reference characters "24" and "38" have both been used to designate the monitor; reference characters "20" and "40" have both been used to designate video RAM; reference characters "34" and "52" have both been used to designate the shift register.

The specification has been amended to clarify that FIG. 2 illustrates a graphic adapter in accordance with one embodiment of the present invention, and FIG. 3 illustrates a VGA in accordance with one embodiment of the present invention. Accordingly, it is now clear that the character generator 26, the video controller 16, video RAM 20, and the shift register 34 are components of a graphic adapter 14 (shown in FIG. 2), and the character generator 32, the video controller 42, video RAM 40, and the shift register 52 are components of the VGA (shown in FIG. 3) which is not necessarily the same as the graphic adapter 14. With this amendment, it is respectfully requested that objection to the drawings be withdrawn.

Objection to Specification

The specification stands objected to under 37 CFR 1.75(d)(1) and MPEP § 608.01 (o), as allegedly failing to provide proper antecedent basis for the claimed subject matter with respect to claims 11 and 15.

The claims have been amended to correct minor errors (“character number” and “mulitple” to --character code-- and --multiples--, respectively) such that the description provides proper antecedent basis for the claimed subject matter. With this amendment, it is respectfully requested that the objection to the specification be withdrawn.

The 35 U.S.C. §112 Rejection, Second Paragraph

Claims 14 and 15 stand rejected under 35 U.S.C. §112, second paragraph, as

being allegedly indefinite for failing to particularly point out and distinctly claim the subject matter applicant regards as the invention.

Claims 14 and 15 have been amended to provide of sufficient antecedent basis. With this amendment it is respectfully submitted the claims satisfy the statutory requirements.

The 35 U.S.C. §102 Rejection

Claims 9, 10, 13, and 21-22 stand rejected under 35 U.S.C. §102(e) as being allegedly anticipated by Kotha et al. (U.S. Pat. No. 5,521,614), among which claims 9 and 21 are independent claims. This rejection is respectfully traversed.

“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.”

*Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ 2d 1051, 1053 (Fed. Cir. 1987). “The identical invention must be shown in as complete detail as is contained in the ... claim.” *Richardson v. Suzuki Motor Co.*, 869 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). *See also*, M.P.E.P. §2131.

Claim 9 defines a method for expanding a first sequence of data elements representing successive rows of successive character cells corresponding to a sequence of text characters to a second sequence of data elements longer than the first sequence. The claimed method comprises (a) receiving a data element representing a row of a text

character cell, (b) forming a horizontal expansion pattern corresponding to the text character based on character code and row number of the text character cell, the row number being determined based on the horizontal frequency, the horizontal expansion pattern being set to a specified length, (c) appending the horizontal expansion pattern to the second sequence of data elements, and (d) determining whether another data element should be read, as recited in claim 9, as amended.

Kotha discloses a method and apparatus for expanding a VGA text character. Kotha describes using the character code signal (column 7, lines 17-25 thereof). However, as the Examiner correctly mentions the Office Action on page 6, line 1, Kotha fails to disclose determining the cell row number, or using the cell row number to form a horizontal expansion pattern as recited in claim 9. Claim 21 also includes substantially the same distinctive feature as claim 9.

Accordingly, it is respectfully requested that the rejection of claims based on Kotha be withdrawn. In view of the foregoing, it is respectfully asserted that the claims are now in condition for allowance.

#### The 35 U.S.C. §103 Rejection

Claims 11, 14-16, 23 and 26-28 stand rejected under 35 U.S.C. §103(a) as being allegedly unpatentable over Kotha, and further in view of Chandavarker et al.(U.S. Pat. No. 940,085), among which claims 14 and 26 are independent claims. This rejection is respectfully traversed.

According to M.P.E.P. §2143,

To establish a *prima facie* case of obviousness, three basic criteria must be met. First there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in the applicant's disclosure.

Claim 14 defines a method for expanding a first sequence of data elements representing successive rows of successive character cells corresponding to a sequence of text characters to a second sequence of data elements longer than the first sequence. The method comprises (a) receiving a plurality of bits representing a plurality of text character cell lines, (b) determining the character cell row number based on the horizontal frequency, (c) determining a first bit and a last bit for each data element within the first sequence, (d) forming a horizontal expansion pattern corresponding to the text character, said pattern set to a specified length, (e) appending the horizontal expansion pattern to the second sequence of data elements, and (f) determining whether another data element should be read, as recited in claim 14, as amended. Claim 26 also includes substantially the same distinctive feature as claim 14.

As the Examiner correctly mentions in the Office Action, as discussed above, the primary reference Kotha fails to disclose determining the cell row number, or using the cell row number to form a horizontal expansion pattern. However, the Examiner relies

on a secondary reference Chandavarker to provide the missing feature of cell row number.

The Applicant hereby respectfully asserts that the cited reference Chandavarker is disqualified under 35 U.S.C. §103(c) for the following reasons:

The present application is a divisional application filed on June 22, 2001, claiming priority based on Parent Application Serial No. 09/261,640 filed on March 2, 1999, now Patent No. 6,281,876 B1, issued on August 28, 2001. Since Chandavarker was filed on December 24, 1996 and issued on August 17, 1999, this reference is qualified as prior art only under 35 U.S.C. §102(e). Chandavarker was owned by Chips and Technologies, LLC at the time the present invention was made, which had also ownership rights to the present invention at the time the present invention was made and was also the assignee as the present application. The assignee Chips and Technologies, LLC later became part of Intel Corporation which name appears as the assignee of Patent No. 6,281,876 B1. It should be noted that the original assignee Chips and Technologies, Inc. of Chandavarker merged into Chips and Technologies, LLC before the present application. Accordingly, Chandavarker should be disqualified under 35 U.S.C. §103(c).

As sufficient evidence to establish common ownership (MPEP §706 (1)(2)), a STATEMENT CONCERNING OWNERSHIP signed by an attorney of record, David B, Ritchie, Reg. No. 31,562, is attached herewith as separate sheet.

In addition, copies of assignment records are also attached as further evidence for the above-stated facts.

Accordingly, since Chandavarker is disqualified as prior art, a prima facie case of obviousness cannot be established, for the same reason as discussed above. It is respectfully requested that the rejection of claims based on Kotha and Chandavarker be withdrawn.

In view of the foregoing, it is respectfully asserted that the claims are now in condition for allowance.

#### Dependent Claims

Claims 11-13 depend from claim 9, claims 15-19 depend from claim 14, claims 22-25 depend from claim 21, and claim 27-29 depend from claim 26, and thus include the limitations of the respective independent claims. The argument set forth above is equally applicable here. The base claims being allowable, the dependent claims must also be allowable at least for the same reasons.

In view of the foregoing, it is respectfully asserted that the claims are now in condition for allowance.

Request for Allowance

It is believed that this Amendment places the above-identified patent application into condition for allowance. Early favorable consideration of this Amendment is earnestly solicited.

If, in the opinion of the Examiner, an interview would expedite the prosecution of this application, the Examiner is invited to call the undersigned attorney at the number indicated below.

Respectfully submitted,  
THELEN REID & PRIEST, LLP

Dated: September 4, 2003



Masako Ando  
Limited Recognition under 37 CFR §10.9(b)

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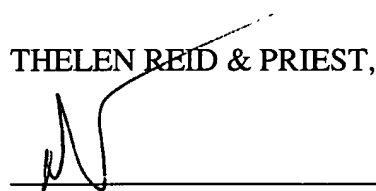
**STATEMENT CONCERNING COMMON OWNERSHIP**

I, David B. Ritchie, an attorney of record for U.S. Patent Application No. 09/888,128, hereby state, as evidence to establish common ownership, as follows:

U.S. Patent Application No. 09/888,128 (Division of U.S. Patent Application No. 09/261,640) and U.S. Patent No. 5,940,085 were, at the time the invention of U.S. Patent Application No. 09/888,128 was made, owned by, or subject to an obligation of assignment to, Chips and Technologies, LLC. Chips and Technologies, LLC was acquired by Intel Corporation and patents and patent applications, including the foregoing, were assigned to Intel Corporation as evidenced by the assignment recorded on January 23, 2001 at Reel 011449 Frame 0081 et seq.

Dated: September 4, 2003

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